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5 Attorneys for Movant, Wilmington Trust, NA,
successor trustee to Citibank, N.A., as Trustee,
6 f/b/o the registered holders of Structured Asset
Mortgage Investments II Trust 2007-AR6,
7 Mortgage Pass-Through Certificates, Series 2007-
AR6
8

9
10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 In re:

14 Cathy Rae Booth

15 Debtor.
16

CASE: 14-40186

CHAPTER: 13

REF: ASW-2737

17 **AMENDED NOTICE OF MOTION FOR**
18 **RELIEF FROM THE AUTOMATIC STAY**

19 Date: 1/13/2016

20 Time: 1:30 pm

Courtroom: 201

21 UNITED STATES BANKRUPTCY COURT
1300 Clay Street
22 Oakland, CA 94612

23 TO Debtor, her counsel Patrick L Forte, and the Chapter 13 Trustee:

24 PLEASE TAKE NOTICE that on January 13, 2016, at 1:30 p.m., or as soon
25 thereafter as the matter can be heard before the Honorable Roger L. Efremsky of the
26 above-entitled Court located at 1300 Clay Street, Oakland, CA 94612, Movant will move
27 this Court for an order granting relief from the automatic stay relative to this Movant's
28

1 interest in the real property commonly known as 3145 KENNEDY STREET,
2 LIVERMORE, CA 94551 ("Property") and more fully described in the Motion herein.

3 The Motion will be made on the grounds that there is cause for relief from stay,
4 including (1) lack of adequate protection; (2) no equity in the subject Property for the
5 benefit of the Debtor and the Property is not necessary for an effective reorganization;
6 and (3) Debtor's failure to make the required Trust Deed payments..

7 The Motion is based upon the pleadings, records and files in this case including
8 the instant Motion and the Declaration in Support of Motion for Relief From Stay filed
9 concurrently herewith.

10 NOTICE IS HEREBY GIVEN that failure to appear at the above hearing will be
11 deemed a waiver of one's rights to oppose this Motion resulting in an order granting
12 relief from stay being entered against you.

13 DATED: December 23, 2015 THE WOLF FIRM
14 A Law Corporation

15 /s/ Daniel K. Fujimoto

16 DANIEL K. FUJIMOTO
17 Attorneys for Movant
18 WILMINGTON TRUST, NA, SUCCESSOR
19 TRUSTEE TO CITIBANK, N.A., AS TRUSTEE,
20 F/B/O THE REGISTERED HOLDERS OF
21 STRUCTURED ASSET MORTGAGE
22 INVESTMENTS II TRUST 2007-AR6, MORTGAGE
23 PASS-THROUGH CERTIFICATES, SERIES 2007-
24 AR6
25
26
27
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1 PROOF OF SERVICE

2
3 RE: Cathy Rae Booth

4 CASE NO.: 14-40186

5 I declare that I am employed in the County of Orange, State of California. I am over the
6 age of eighteen years and not a party to the within action. My business address is 2955 Main
7 Street, Second Floor, Irvine, CA 92614. On December 23, 2015 I served a **AMENDED**
8 **NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY** on each of the interested
9 parties by placing a true copy thereof in a sealed envelope with postage thereon fully prepaid
10 in the United States mail at Irvine, California, addressed as follows:

11
12 SEE ATTACHED LIST MARKED AS
13 EXHIBIT "1" AND INCORPORATED
14 HEREIN BY REFERENCE

15 I declare under penalty of perjury that the foregoing is true and correct and that this
16 declaration was executed on December 23, 2015, at Irvine, California.

17
18 /S/ Thomas Coniglio
19 Thomas Coniglio

EXHIBIT "1"

RE: Cathy Rae Booth
CASE NO.: 14-40186

Debtor:

Cathy Rae Booth
3145 Kennedy Street
Livermore, CA 94551-5929

Debtor's Counsel:

Patrick L. Forte
Law Offices of Patrick L. Forte
1624 Franklin St. #911
Oakland, CA 94612

Chapter 13 Trustee:

Martha G. Bronitsky
P.O. Box 5004
Hayward, CA 94540

U.S. Trustee:

Office of the U.S. Trustee - Oakland
1301 Clay Street, Suite 690N
Oakland, CA 94612

Judge:

Honorable Roger L. Efremsky
Attention: Chambers Copies
P.O. Box 2070
Oakland, CA 94604-2070